

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of

Promoting Investment in the 3550-3700 MHz Band;

GN Docket No. 17-258

Petitions for Rulemaking Regarding the Citizens Broadband Radio Service

RM-11788(Terminated)

RM-11789 (Terminated)

**Comments of
EBTX Wireless, LLC
16203 Senkel Rd.
East Bernard, TX 77435**

Stephen Gertson, owner/member

To: The Commission

I am writing on behalf of EBTX Wireless, LLC. We are a small family owned WISP that serves rural areas in north Wharton County, Texas and extreme west Fort Bend County, Texas. We installed our first customer in November 2016. We have grown to over 200 customers in our short time in business. We may seem small to you, but we are adding 10-20 customers per month which is a great number for the number of households in our market. We have plans to serve our local area with tremendous service by using many different technologies and frequencies. For a small company, we have made significant investment into LTE equipment in the 3650-3700 MHz band to serve our rural customer base with high speed internet. This investment was made with hopes of being able to participate in the auction for spectrum that was proposed for the CBRS band. In addition, as we have gained experience, we know that interference mitigation is important to us as well as our competitors. We work together

to not interfere with each other. The CBRS band in census tract sized PALS gives us hope to better serve our area.

I am writing to oppose the proposed changes in the CBRS band to expand the size of PALS and lengthen the terms. The expansion of the PALS to large areas such as Partial Economic Areas (PEAs) are totally in favor of very large companies that would love to gain access and control of the proposed CBRS bands, large geographic areas, and rules to give priority to their service offerings. In my opinion, PALS issued in census tract size with a three to five-year term allow for smaller companies like my own the ability to participate in the spectrum auction and offer better service and coverage in our own geographic areas. Many in our industry do not cover large geographic areas with service, but we are committed to our areas on more than just a business basis—we want to enhance the quality of life in our areas with the services we provide. Of course, we want to do this for a profit, but also we want to do this to help those who are our friends and neighbors—people we care about. We are financially and emotionally invested in our communities. Many in rural America may not benefit by offering PALS in PEA size. The larger operators hope to gain control of a large areas to eliminate competition and not necessarily build out an area to enhance service to those in rural America. The small census block auctions make perfect sense for rural America to afford small companies like ours the ability to gain access to spectrum without fear of interference from others or producing interference for others. The large operators would love to make a broader regionalized auction of spectrum to preclude small operators like us from being able to even enter the game. Small operators like us are more in tune with the needs and desires of our local citizens. We generally provide same day service for problems or outages, unlike the big operators that would want to schedule a service call in “x” number of days. Our rural area needs and desires a solid solution for internet that has great speed, reliability and service.

Our LTE investment has allowed us to serve customers with high speed internet, those customers had no other option besides very expensive and “throttled” satellite internet prior to our putting our 3650 LTE gear into place. The ability to gain access to un-interfered spectrum would allow us the opportunity to increase the speeds we offer to each customer and to offer that service to more and more customers that are unable to get high speed internet in our rural setting. The big companies like Sprint, AT&T, T-Mobile and other large carriers would love to monopolize the spectrum and push out those of us already using the spectrum available to serve our surrounding areas. If they can push out the competition, they can raise prices of the service. If they can eliminate the competition, they don’t have to worry about the quality of service they provide because there won’t be any competition to come in and fill the need.

In our rural area, we are not the only rural provider using the 3650-3700 MHz spectrum. We currently coordinate frequencies with a competitor. Allowing us all to be able to participate in the CBRS auction on a census tract basis would allow both of us to better serve our rural customers due to “de-congesting” the available spectrum in our area. Interference will be reduced, our company could invest and expand into more and more remote areas knowing that we have some protection to help offset the additional investment that expansion will require. Our goal for EBTX Wireless, is to offer our small area of Texas the best, most available, most reliable, and fastest reasonably priced internet service that anyone in the area can have access to.

More times than not in rural America small operations like ours are able to do things more effectively than large companies. We make our decisions and customer plans based on what our consumers want and desire rather than force our customers into plans like the big companies. The big guys always want to paint their coverage map with their colors to boast how much coverage they can offer, but they are not in tune with the rural areas like rural WISPs. Rural WISPs serve a great portion of

the map that the big guys do not really care to provide enough equipment to cover. Insuring small census block auctions for the CBRS band and a reasonable manner for the auction, will help rural WISPs continue to improve our current coverage and allow us the opportunity to invest to better penetrate our rural areas with great, reliable, high speed internet due to the reduction in congestion and interference in the proposed spectrum.

Many in my industry have made comments regarding this issue. We at EBTX Wireless, LLC belong to WISPA. Our industry association has filed comments regarding the CBRS Band and rules. In addition, Baicells, the manufacturer that we have bought equipment from, has offered comments in these proceedings as well. We fully support the comments made by WISPA and Baicells.